

EXHIBIT 1

DECLARATION OF DAVID L. JOHNSON

1. Plaintiff “Weather King” fully paid all of the invoices attached as Exhibit B to my July 15, 2025 declaration. Furthermore, Weather King has timely paid all fees and expenses in this matter and continues to do so.

2. Attached hereto as Exhibit A is a summary of the unredacted data set forth in Exhibit B to my July 15, 2025 declaration (“Lodestar Summary and Revised Totals”), plus additional fees discussed below. This information shows that the total hours requested (after culling out the Lassen entries) is 294.3 and the average rate is \$480 per hour. The lodestar calculation therefore totals \$141,264.00, compared with the actual revised total of \$128,658.50. Ex. A.

3. The billing rates of Butler Snow LLP timekeepers reflected in the invoices attached as Exhibit B to my July 15, 2025 declaration for which Weather King seeks reimbursement are set forth in those invoices.

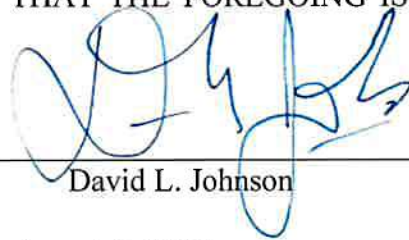
4. True and correct copies of summaries of the pertinent attorney timekeepers’ experience are set forth hereto in Collective Exhibit B.

5. Over the course of my legal career expanding more than 25 years, I have litigated hundreds of cases across the State of Tennessee, including in the Eastern Division of the United States District Court for the Western District of Tennessee. Based on my experience, I believe the billing rates and amount spent to be reasonable and customary taking into account the complexity of this lawsuit and each of the timekeepers’ experience and areas of expertise.

6. In connection with Weather King’s fee application, ECF No. 243 (including its reply filings), Weather King has incurred the additional sum of \$16,063.00 in attorneys’ fees. *See* Exhibit C hereto, Attorneys’ Fees Since Issuance of Sanctions Order. The timekeepers for these filings include attorneys David Johnson (8.9 hours at \$450/hr.), John Dollarhide (24.3 hours at

\$445/hr.), and Danny Van Horn (0.8 hours at \$595/hr.), as well as Paralegal Jeff Baum (2.9 hours at \$265/hr.) This amount already excludes 0.9 hours for time expended on August 5 by Mr. Dollarhide deducting entries from Weather King's initial application that were not attributable to Defendants Maupin, Harrell, Harrod, Feagin, and American Barn Co. (collectively, "the Defaulted Defendants"). *See* Ex. C. These additional fees were also reasonable and necessarily incurred by Weather King as a consequence of the Defaulted Defendants' failure to comply with the Court's August 29, 2023 Order.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.



David L. Johnson

Date: August 6, 2025

EXHIBIT A

Lodestar Summary and Revised Totals

Invoice Date	DLJ Hours	DLJ \$	JHD	JHD \$	DWV Hours	DWV \$	JIML Hours	JIML \$	JEFB Hours	JEFB \$	TOTAL \$
10/10/2023	0	\$0.00	2	\$800.00	0	\$0.00	0	\$0.00	0	\$0.00	\$800.00
11/7/2023	19.5	\$8,775.00	8.6	\$3,440.00	0.6	\$303.00	0	\$0.00	0	\$0.00	\$12,518.00
12/11/2023	3.9	\$1,755.00	5.3	\$2,120.00	0	\$0.00	0	\$0.00	0	\$0.00	\$3,875.00
1/8/2024	1.1	\$495.00	2.6	\$1,040.00	0	\$0.00	0	\$0.00	0	\$0.00	\$1,535.00
2/12/2024	1.4	\$630.00	13.7	\$6,096.50	0	\$0.00	0	\$0.00	0	\$0.00	\$6,726.50
3/15/2024	1.2	\$540.00	10.4	\$4,628.00	0	\$0.00	0	\$0.00	0	\$0.00	\$5,168.00
4/4/2024	0.3	\$135.00	14	\$6,230.00	0	\$0.00	0	\$0.00	0	\$0.00	\$6,365.00
5/7/2024	0	\$0.00	9.4	\$4,183.00	0	\$0.00	0	\$0.00	0	\$0.00	\$4,183.00
6/14/2024	0	\$0.00	17.4	\$7,743.00	0	\$0.00	0	\$0.00	0	\$0.00	\$7,743.00
7/5/2024	0	\$0.00	2.1	\$935.50	0	\$0.00	0	\$0.00	0	\$0.00	\$935.50
8/7/2024	0	\$0.00	6.2	\$2,759.00	0	\$0.00	0	\$0.00	0	\$0.00	\$2,759.00
9/12/2024	0.5	\$225.00	4.4	\$1,958.00	0	\$0.00	0	\$0.00	0	\$0.00	\$2,183.00
10/8/2024	0.2	\$90.00	5.2	\$2,314.00	0	\$0.00	0	\$0.00	0	\$0.00	\$2,404.00
11/8/2024	3.2	\$1,440.00	2.1	\$935.50	0	\$0.00	0	\$0.00	0	\$0.00	\$2,375.50
12/13/2024	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00	\$0.00
1/17/2025	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00	\$0.00
2/17/2025	35.1	\$15,795.00	1.5	\$667.50	0	\$0.00	0.3	\$217.50	0	\$0.00	\$16,680.00
3/6/2025	31.9	\$14,355.00	22.3	\$10,073.50	3.5	\$2,082.50	0	\$0.00	7.4	\$1,961.00	\$28,472.00
4/7/2025	3.2	\$1,440.00	5.2	\$2,314.00	0	\$0.00	0	\$0.00	6.8	\$1,802.00	\$5,556.00
5/7/2025	5.9	\$2,655.00	1.7	\$756.50	0.8	\$476.00	0	\$0.00	0	\$0.00	\$3,887.50
6/16/2025	0.4	\$180.00	2.2	\$979.00	0	\$0.00	0	\$0.00	0	\$0.00	\$1,159.00
July 2025 time	1.8	\$810.00	9.7	\$4,316.50	0.5	\$297.50	0	\$0.00	0	\$0.00	\$5,424.00
August 2025 time	7.1	\$3,195.00	14.6	\$6,497.00	0.3	\$178.50	0	\$0.00	2.9	\$768.50	\$10,639.00
Subtotals:	116.7	\$52,515.00	160.6	\$70,786.50	5.7	\$3,337.50	0.3	\$217.50	17.1	\$4,531.50	\$131,388.00

2729.5 Reduction per Reply at fn 3

Total Hours 294.3 (after reducing Lassen entries)
Average Rate 480
Lodestar \$ 141,264.00

\$128,658.50 Total Revised Attorneys' Fees

Lodestar Average Hourly Rate Calculation						
DLJ Rate	JHD Rate (1)	JHD Rate (2)	DWV Hours	JIML Hours	JEFB Hours	Average
Full	thru 1/2024	2/2024 - end	Full	Full	Full	
450	400	445	595	725	265	480

EXHIBIT B



DAVID L. JOHNSON

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david.johnson@butlersnow.com

OVERVIEW

David has nearly 30 years of experience practicing litigation in a variety of practice areas, including labor and employment, commercial, and products liability matters. A Fellow in the College of Labor and Employment Lawyers, he has particularly extensive experience in non-compete and trade secret matters. David is recognized in Chambers USA and other publications.

PRACTICE AREAS

- [Appellate & Written Advocacy](#)
- [Commercial Litigation](#)
- [Employment Counseling](#)
- [Employment Litigation](#)
- [Labor & Employment](#)

INDUSTRY

[Construction](#)

EXPERIENCE

- Favorable result for a condemnation authority in an eminent domain jury trial in 2016.
- Successful verdict obtained as first chair of a construction trial believed to be the longest trial in the history of the Wilson County, Tennessee Chancery Court.
- Successfully represented numerous clients at injunction hearings involving non-compete agreement and trade secrets allegations.
- Successfully obtained an appeal of a multi-million dollar jury verdict against an assisted living facility.
- Prevailed in web domain dispute involving 66 domain names in what is believed to be among the lengthiest arbitration rulings in National Arbitration Forum history (No. FA1406001563720, NAF July 30, 2014).
- Participated in briefing of case in which U.S. Supreme Court granted certiorari.
- Briefed and/or argued approximately 30 cases in federal and state appeals courts.

DISTINCTIONS

- Fellow, College of Labor and Employment Lawyers
- *Chambers USA, America's Leading Lawyers for Business*
 - Labor & Employment (Tennessee), 2025
- *Who's Who Legal, Labour & Employment*, 2022
- *Martindale-Hubbell®*
 - AV®- Preeminent™ Peer Review Rated, 2008-2022
- *BL Rankings, The Best Lawyers in America®*
 - Litigation – Labor & Employment, 2014-2025
 - Litigation – ERISA, 2015-2025
 - Employment Law – Management, 2018-2025
 - Lawyer of the Year, Employment Law – Management [Nashville], 2025
 - Lawyer of the Year, Litigation – ERISA [Nashville], 2018, 2020, 2022, 2024
- *Benchmark Litigation*
 - Labor & Employment Star, 2019, 2021
- *Thomson Reuters Super Lawyers®*
 - Mid-South Super Lawyers, Employment & Labor, 2013-2024
 - Mid-South Rising Stars, Employment & Labor, 2010-2012
- Spearheaded addition of Rule 72 to the Tennessee Rules of Civil Procedure
- Co-Editor, American Bar Association Business Torts Journal, (2012-2016)
- Editor-in-Chief, Employment at Will: A State-by-State Survey (BNA) (2016-present)
- Co-Editor, American Bar Association Business Torts Journal (2012-2016)
- Co-Editor, Tennessee Employment Law Newsletter (BLR) (2014-present)
- Tennessee Chapter Editor, Covenants Not to Compete: A State-by-State Survey (BNA) (2013-present)
- Tennessee Chapter Editor, Trade Secrets: A State-by-State Survey (BNA) (2013-present)
- Tennessee Chapter Editor, Tortious Interference in the Employment Context: A State-by-State Survey (BNA) (2013-present)
- Tennessee Chapter Editor, Employee Duty of Loyalty: A State-by-State Survey (BNA) (2013-present)
- Tennessee High School Mock Trial Competition, *Chair*, 2004
- American Bar Association, Young Lawyers Division Star of the Year Award, 2007
- Tennessee Bar Association, Young Lawyers Division Outstanding Service Award, 2007
- Tennessee Bar Association, Young Lawyers Division Star of the Quarter Award, 2006-2007

BAR ADMISSIONS

- Tennessee, 1997
- U.S. District Courts
 - Tennessee: Eastern, Middle, Western
- U.S. Court of Appeals
 - 6th Circuit
 - 8th Circuit
 - Federal Circuit
- U.S. Supreme Court

EDUCATION

- Vanderbilt University Law School, J.D., 1997
 - Associate Managing Editor, *Vanderbilt Law Review*
- Wake Forest University, B.A., 1993
- Clerkship, Justice Frank Drowota, Tennessee Supreme Court, 1998-1999
- Clerkship, Judges W. Frank Crawford and Holly Kirby, Tennessee Court of Appeals, 1997-1998

ASSOCIATIONS

- American Bar Association
 - Labor and Employment Law Section (multiple leadership positions)
 - Section of Litigation (multiple leadership positions)
 - ABA Business Torts Journal
 - Co-Editor
- Nashville Bar Association
 - Employment and Civil Rights Committee
 - Chair, 2006-2009
- Tennessee Bar Association
 - House of Delegates, 2004-2009
- Rotary Club of Nashville
- Nashville Chamber of Commerce
 - New Member Advisory Committee
 - Partnership 2020 Task Force

PAPERS, PRESENTATIONS & PUBLICATIONS

- Presenter, "Navigating the FTC's Final Rule Restricting Noncompete Agreements," Butler Snow LLP, April 30, 2024.

- Author, "6th Circuit clarifies when increased scrutiny may show unlawful retaliation," Tennessee Employment Law Letter, September 2020.
- Presenter, "Responding to the COVID-19 Threat in the Workplace," BLR Webinar, June 18, 2020.
- Presenter, "Unfair Competition in the Workplace: An Update on Restrictive Covenants Agreements, Corporate Raiding, Duty of Loyalty, and Tortious Interference," Association of Corporate Counsel Tennessee, Knoxville, Tenn., October 15, 2019.
- Author, "**Expert Disclosures: Navigating the Distinction Between Retained and Non-Retained Experts,**" *Pro Te: Solutio*, Vol. 12 No. 3, September 2019.
- Author, "**Courts find that Memphis and Nashville workers were unlawfully fired for racially-charged Facebook postings,**" Nashville Business Journal, September 19, 2019.
- Author, "Preparing to Compete: When does it cross the line?" *Flash*, American Bar Association of Labor and Employment Law, April 2019.
- Moderator, "Plaintiff Attorneys' Panel," American Bar Association, 2019 Negotiation Institute, San Diego, Calif., February 15, 2019.
- Presenter, "Non-Compete Agreements: Tricks or Treats," Nashville Bar Association, October 29, 2018.
- Co-Author, "Considering Workers' Comp For Unauthorized Immigrants," Law360, September 14, 2018.
- Co-Author, "**Tennessee court gives no quarter to fired undocumented immigrant,**" Tennessee Employment Law Letter, August 29, 2018.
- Presenter, "Candidate Poaching: When It's Smart-and Legal- and When to Steer Clear," BLR Events, RecruitCon 2018, Nashville, TN, May 11, 2018.
- Author, "**TN Court of Appeals upholds \$425,000 award in favor of nurse who blew the whistle,**" Tennessee Employment Law Letter, November 2017.
- Author, "**Managing issues posed by opioids in the workplace,**" Tennessee Employment Law Letter, November 2017.
- Author, "**Handling workplace vigilantes,**" Tennessee Employment Law Letter, August 2017.
- Author, "**Office politics: preventing disruptive political discourse,**" Tennessee Employment Law Letter, May 2017.
- Author, "When Does Preparing to Compete Cross the Line,?" BizLitNews Blog, March 2017.
- Author, "**Tips on employee raiding for Tennessee employers,**" Tennessee Employment Law Letter, February 2017.
- Author, "**Walking the workplace proselytizing tightrope,**" Tennessee Employment Law Letter, November 2016.
- Presenter, "Whistleblowing in Tennessee: Update on Retaliatory Discharge and the TPPA," Webinar, September 2016.
- Author, "**Avoiding snares in workplace wellness programs,**" Tennessee Employment Law Letter, August 2016.
- Presenter, "Attorneys' 2016 Employment Law Update: Latest from the Tennessee Legislature and Courts," Webinar, May 2016.
- Author, "**The nuts and bolts of noncompete agreements,**" Tennessee Employment Law Letter, May 2016.

- Presenter, "Sticky Wickets in Joint Representation," ABA Section of Labor and Employment, New Orleans, LA, March 2016
- Co-Author, "**Can Economic Pressure Alone Give Rise to a Tortious Interference Claim?**" American Bar Association, Section on Litigation, Business Torts Journal, August 20, 2015.
- Author, "Ethical Challenges Lurk in Multi-Plaintiff Cases," *American Bar Association Labor and Employment Law Newsletter*, Vol. 23, Num. 4, Summer 2015.
- Co-Presenter, "Overcome Compliance and Employee Leave Challenges," 2015 FMLA Masters Class, Nashville, TN, May 12, 2015.
- Author, "**Major changes in store for Tennessee wrongful discharge law,**" *Workplace*, Vol. 2014, No. 11, September 2014.
- Author, "**How To Avoid the Tide of Lawsuits Brought By Foreign Nationals,**" *Pro Te: Solutio*, Vol. 7 No. 1, 3-11, March 2014.
- Co-Presenter, "Updates in Retaliatory Discharge," Tennessee Bar Association CLE, May 2014.
- Author, "**Effective Use of Non-Competition/Non-Solicitation Agreements In The Workplace,**" *Workplace*, Vol. 2013 No. 8, September 2013.
- Co-Presenter, "Covenants Not to Compete: Overview and Drafting Tips for Tennessee Attorneys," webinar, August 2013.
- Author, "**Federal Law Provides Enhanced Trade Secret Protection for Employers,**" *Workplace*, Vol. 2013 No. 3, April 2013.
- Co-Author, "**When Does Preparation to Compete Become Unlawful Conduct?**" *Business Torts Litigation*, Winter 2013, Vol. 20, No. 2.
- Author, "**Panelists Address Future of Labor and Employment Practice,**" *Labor and Employment Law*, Fall 2012, Vol. 41, No. 1.
- Author, "**The Parameters of 'Solicitation' in an Era of Non-Solicitation Covenants,**" *28 ABA Journal of Labor & Employment Law* 99, 2012.
- Presenter, "Tennessee Employment Law: Trends, Recent Cases, and New Laws," M. Lee Smith Publishers Webinar, 2012.
- Co-Author, "**Independent Contractors: Tennessee,**" Practical Law Company, November 2012.
- Presenter, "Workplace Harassment: What You Need to Know," American Bar Association Section of Labor & Employment Law Annual Conference, Atlanta, Georgia, 2012.
- Presenter, "To Depose or Not to Depose," American Bar Association Labor & Employment Annual Conference, Seattle, WA, 2011.
- Presenter, "Hot Topics in Tennessee Employment Law," Nashville Bar Association Annual Conference, 2011.
- Presenter, "Tennessee Supreme Court Boot Camp," Tennessee Bar Association, 2011.
- Presenter, "State of the Union: Rule 56 and Rule 12 Motions in Tennessee," Tennessee Farmers Mutual Insurance Company Attorney's Day, 2011.

- Presenter, "Immigration Reform Law/Summary Judgment," Tennessee Chamber of Commerce Webinar, 2011.
- Presenter, "Tennessee Non-Compete and Non-Solicitation Agreements," M. Lee Smith Publishers Webinar, 2011.
- Presenter, "Exploiting Pleading Pitfalls," American Bar Association Labor & Employment Section, 2011.
- Presenter, "Retaliatory Discharge in Tennessee," Tennessee Bar Association Webcast, 2011.
- Presenter, "Employment Contracts in Tennessee," Lorman, 2011.
- Author, "Implementation of Health Care Reform Law Remains Priority," *ABA's Labor and Employment Law Newsletter*, Winter 2011.
- Author, "Case Study: Inland Am. Winston Hotels v. Crockett," *Employment Law 360*, June 2011.
- Author, "Paring Peer Review," *Tennessee Bar Journal*, October 2010.
- Presenter, "Defending a Retaliatory Discharge Claim in Tennessee in Light of Gossett," Tennessee Attorneys Memo, 2010.
- Presenter, "Employment Law Risk Management," 2010 Nashville HR/Finance Conference.
- Presenter, "Lee Medical, Inc. v. Beecher," Tennessee Hospital Association, 2010.
- Presenter, "Tennessee Non-Competes and Non-Solicitations: Latest From the Appellate Courts and Practical Drafting Tips," M. Lee Smith Publishers, 2010.
- Presenter, "Workplace Investigations: Tips to Investigate Employee Complaint," Address Employee Concerns and Mitigate Liability, Nashville Area Chamber of Commerce, 2010.
- Author, "Crawford v. Metropolitan Government of Nashville," *ABA's Labor and Employment Law Newsletter*, February 2009.
- Presenter, "Exploring Retaliatory Discharge: Answers for Tennessee Attorneys," Tennessee Attorneys Memo, 2009.
- Presenter, "From Union Arbitration to Discrimination Rulings: The Latest on Employment Law from the U.S. Supreme Court," Tennessee Attorneys Memo, 2009.
- Presenter, "The Basics: Noncompete Covenants and Trade Secrets, ABA Labor and Employment Section," Employment Rights Responsibilities Committee Mid-Year, Puerto Vallarta, Mexico (2006).
- Presenter, "Enhancing Your Legal Writing Skills," Tennessee Bar Association, Nashville, TN, 2006.
- Author, "Successor Liability Law in Products Liability Actions," *DRI's For the Defense*, December 2005.
- Presenter, "Enforceability of Non-Compete Agreements," Lorman, Nashville, TN, 2005.
- Presenter, "Responsibility for Workplace Subpoenas," Lorman, Nashville, TN, 2005.
- Presenter, "The U.S. Supreme Court Year in Review," ABA Annual Meeting, Chicago, IL, 2005.
- Presenter, "The U.S. Supreme Court Year in Review," ABA Labor and Employment Section, Employment Rights and Responsibilities Committee Mid-Year Meeting, Miami, FL, 2005.
- Presenter, "The ADA/FMLA/Workers' Compensation Bermuda Triangle," ABA Annual Meeting, Atlanta, GA, 2004.
- Presenter, "The ADA/FMLA/Workers' Compensation Bermuda Triangle," Lorman, Nashville, TN, 2004.
- Presenter, "Appellate Advocacy," Tennessee Bar Association, Nashville, TN, 2003.

- Presenter, "The Basics: Noncompete Covenants and Trade Secrets," ABA Annual Meeting, San Francisco, CA, 2003.
- Author, "Attorney's Fees in Trade Secret Litigation," *DRI's Defending Intellectual Property Claims*.
- Author, Tennessee portion of DRI's Trade Secrets Compendium.
- Author, "Supreme Court Reduces First Amendment Protection for Job-Related Speech," *ABA's Labor and Employment Law Newsletter*.
- Author, "Rabin Finds Pragmatism in Court's Approach," *ABA's Labor and Employment Law Newsletter*.
- Contributor, Tennessee Employment Law Letter.
- Author, "Reinvigoration of the Market Participant Exception in the Arena of Municipal Solid Waste Management," 49 Vand. L. Rev. 753, 1996.



JOHN H. DOLLARHIDE

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OVERVIEW

John practices with the firm's Commercial Litigation group and concentrates his practice in the areas of business torts, fiduciary liability, financial services litigation, and intellectual property litigation.

PRACTICE AREAS

- [Business Torts & Unfair Competition](#)
- [Financial Services Litigation](#)
- [Estate/Trust Fiduciary Litigation](#)
- [Insurance](#)
- [Director & Officer Liability](#)
- [Environmental Litigation](#)
- [Intellectual Property Litigation](#)
- [Mass Torts](#)

EXPERIENCE

- Second-chaired trade secrets and unfair competition jury trial that was sent to the jury and resolved during deliberations.
- Summary judgment granted to client financial institution on alleged liability for forged signatures.
- Defense verdict and award of attorneys' fees on counterclaim in one-day bench trial in breach of contract case.
- AAA arbitration in which arbitrator found for lender on attorneys' fees counterclaim and against claimant in demand for payment of \$750,000 "lost" loan proceeds.
- Summary judgment granted in suit on personal guaranty and dismissing counterclaims, affirmed on appeal.
- Telephone Consumer Protection Act case, denying motion to remand and motion for leave to amend to plead damages less than jurisdictional amount as bad faith attempt to manipulate forum.
- Summary judgment granted in slip-and-fall case.
- Summary judgment, affirmed on appeal, in premises liability/toxic exposure case.
- Judgment on the pleadings granted to defendant banks and mortgage servicers in wrongful foreclosure case.

DISTINCTIONS

- *Martindale-Hubbell®*
 - AV®- Preeminent™ Peer Review Rated, 2014-2021
- *Thomson Reuters Super Lawyers®*
 - Mid-South Rising Star, Business Litigation, 2015-2020
- *BL Rankings, The Best Lawyers in America®*
 - Ones to Watch, Commercial Litigation, 2021-2025
 - Ones to Watch, Financial Services Regulation Law, 2021-2025
- Top 50 Under 40, *Mississippi Business Journal*, 2021
- Leadership Forum, Mississippi Bar, 2016
- Outstanding Service Award, Jackson Young Lawyers, 2014

BAR ADMISSIONS

- Tennessee, 2022
- Mississippi, 2010
- U.S. District Courts
 - Michigan: Eastern
 - Mississippi: Southern, Northern
 - Tennessee: Western, Middle, Eastern
- U.S. Court of Appeals
 - 5th Circuit

EDUCATION

- Mississippi College, J.D., *summa cum laude*, 2010
 - Articles Editor, *Mississippi College Law Review*
 - Moot Court Board
 - Am Jur Awards in 12 legal areas
 - Internship, Federal District Judge Daniel P. Jordan, III, Southern District of Mississippi
 - Internship, Federal Magistrate Judge James C. Sumner, Southern District of Mississippi
- Mississippi State University, B.S., Psychology, *magna cum laude*, 2005

ASSOCIATIONS

- American Bar Association
 - YLD Local Affiliate Designee, 2016
- Mississippi Bar Association
 - Professionalism Committee
 - Public Information Committee, 2017
- Jackson Young Lawyers
 - President, 2016-2017
- Defense Research Institute (DRI)
 - Seminar Planning Committee
 - Chair, 2021
 - Young Lawyers Steering Committee
 - Development Education Subcommittee
 - Webcast Subcommittee
 - Activities Subcommittee
- Capital Area Bar Association
 - Board Member, 2015-2017
- Mississippi Volunteer Lawyers Project
 - Advisory Board Member
- Association of Certified E-Discovery Specialists (ACEDS)

PAPERS, PRESENTATIONS & PUBLICATIONS

- Moderator, "Technology and Ethical Issues in the Practice of Law," Tennessee Bar Association IP Law Blast CLE, April 2022.
- Author, "E-Discovery: Obtaining Electronically Stored Information," Mississippi Practice Series, Mississippi Civil Procedure, Vol. 1, 2021.
- Co-Presenter, "Commercial Litigation/Contract Disputes," CPA Industry Conference, October 2019.
- Presenter, "Effective Utilization of Technology, New Lawyer CLE Program," September 2017.
- Author, "Fast Pitch: Young Lawyers Hone Business Development Skills at Seminar," *DRI For the Defense*, August 2017.
- Presenter, "Practicing Attorneys Panel," E-Discovery CLE, January 2017.
- Moderator, "Ethics in E-Discovery: Practical Considerations, A Panel Discussion," Electronic Discovery: Recent Developments & Trends CLE, September 2016.
- Co-Author, "[Alabama No Longer An Outlier State: Legislature says 'No' to Innovator Liability](#)" *Pro Te: Solutio*, Vol. 8 No. 3, December 2015.
- Presenter, "Finding Leverage in the Weeds: A Guide to E-Discovery," Eaton Corporation E-Discovery CLE, November 2015.
- Presenter, "Electronic Discovery: Recent Developments & Trends," October 2015.

- Presenter, "The Rules of Evidence: A Practical Toolkit," National Business Institute, September 2015.
- Presenter, "eDiscovery: A Refresher," Volunteer Lawyers CLE Seminar, July 2015.
- Panelist, "Ethics in eDiscovery: Practical Perspectives," E-Discovery CLE Program, October 2014.
- Presenter, "A Primer on E-Discovery," CLE Seminar, October 2014.
- Presenter, "eDiscovery: Start to Finish," Volunteer Lawyers CLE Seminar, July 2014.
- Author, "**Finding Leverage in the Weeds: A Guide to E-Discovery**," *The Mississippi Lawyer*, Vol. LX, No. 1, Fall 2013.
- Author, "**Document Retention and Destruction**," Lorman Education Services, 2013.
- Author, "Everything You Don't Know About E-Discovery (But Wish You Did)," National Business Institute, May 2013.
- Author, "Find it Free and Fast on the Net: Strategies for Legal Research on the Web," National Business Institute, May 2013.
- Author, "Applying the Rules of Evidence: What Every Attorney Needs to Know," National Business Institute, March 2013.
- Mississippi Section, *The Collateral Source Rule: A Compendium of State Law*, Defense Research Institute, 2012.
- Author, "Court Holds that RESPA Anti-Kickback Provision Prohibits Only Split-Fee Transactions," *DRI Today*, May 2012.
- Author, "**Lawsuits Challenging the 2010 Healthcare Reform Legislation**," *Pro Te: Solutio*, Vol. 4 No. 1, Feb. 2011.
- Author, "Consistency in the Courts: Settled Law and Recent Updates on Judicial Estoppel and Election of Remedies," *MDLA Quarterly*, Winter 2010.
- Author, "Effect of Judicial Estoppel on Plaintiff's Personal Injury Claim – What Every Defense Lawyer Needs to Know," Southern Law Network, October 2010.



DANIEL W. VAN HORN

P (901) 680-7331 | F (901) 680-7201

danny.vanhorn@butlersnow.com

OVERVIEW

Danny is an experienced, aggressive and solutions-oriented trial attorney in complex commercial matters, including matters in highly regulated industries. He has fought for clients obtaining successful verdicts in disputes concerning breach of contract, closely held businesses, unfair competition, construction, intellectual property and real estate related cases.

PRACTICE AREAS

- [Commercial Litigation](#)
- [Business Torts & Unfair Competition](#)
- [Intellectual Property Litigation](#)
- [Mass Torts](#)

INDUSTRY

[Pharmaceutical, Medical Device and Healthcare](#)

ABOUT

Danny Van Horn is an experienced trial attorney and litigator in complex commercial matters. He has obtained successful verdicts and arbitration awards for clients in unfair business practices, breaches of contract, intellectual property disputes, real estate litigation and insurance coverage cases, as well as disputes concerning closely held and highly regulated businesses.

Danny regularly tries cases and arbitrations in Tennessee, Arkansas and Mississippi. He has tried an arbitration or case in 16 states and three foreign countries. He is known as a practical problem solver who has a keen sense of a client's ultimate business objective and keeps that in focus throughout the life of the case.

Danny is AV®-Preeminent™ Peer Review rated by *Martindale-Hubbell®*, and his work has been recognized by *The Best Lawyers in America®* in Commercial Litigation and Banking and Finance Litigation and *Mid-South Super Lawyers®*. In 2020, Danny was named to the *Memphis Business Journal's* Best of the Bar. He has served in leadership roles for the American Bar Association (Chair of the Section of Litigation 2022-2023) and Tennessee Bar Association (President 2011-2012). Danny has been recognized as a National Outstanding Eagle Scout.

In 2020, Danny authored an article for *Law360*: "Tenn. Ruling Has Broad Relevance to Damages Caps in State," (*Law360*, March 9, 2020). He has been a frequent presenter on "Ethics for In House Counsel" and Tennessee law on covenants not to compete, trade secrets, and fiduciary duties.

Danny obtained his J.D. from Vanderbilt University and is admitted to the State Bars of Arkansas, Mississippi, and Tennessee, the U.S. District Courts for the Eastern, Middle and Western Districts of Tennessee, Northern and Southern Districts of Mississippi, Eastern and Western Districts of Arkansas, and the U.S. Court of Appeals for the Fifth, Sixth and Eighth Circuits.

EXPERIENCE

- Represented a national retailer in a MDL consumer class action. *In Re: Family Dollar Stores, Inc. Pest Infestation Litigation – MDL* W.D. Tenn. Case No. 2:22-md-03032 (2023)
- Represented an interstate natural gas pipeline transmission company in disputes concerning the extension of the pipeline to Ford's Blue Oval City mega site. (2023)
- Obtained an arbitration award in favor of a minority owner against the majority owners reinstating her ownership in the companies after they wrongfully expelled her from membership. (May 2023 – Arkansas AAA Commercial Arbitration).
- Obtained a defense verdict in a Lanham Act case that was tried to a bench verdict concerning the ownership of trademarks. *Consolidated Staffing, Inc. v. Consolidated Staffing Solutions, Inc.*, W.D. Tenn. Case No. 19-2483 (September 2022).

- Successfully won an appeal of an administrative hearing before the Arkansas Insurance Department concerning the meaning and application of Arkansas law to reimbursements for services provided by ambulatory surgery centers. *Freeway Surgery Center et al. v. Commissioner McClain and Arkansas Blue Cross Blue Shield*, Number 60CV-21-2725, Pulaski County, AR Circuit Court, December 2021.
- Obtained an arbitration award in favor of our client for breach of a distributor agreement and purchase and sale agreement for a California medical device distributor. *MicroPort OrthoPedics, Inc. v. Advanced Surgical Devices and William Zurowski*, AAA Arbitration Matter Number 01-18-0002-8914. Memphis, TN. November 2019.
- Tried a commercial breach of lease case to a successful conclusion involving the lease of a movie theater and whether the option to renew the lease had or had not been timely exercised. *Malco Stage Road, LLC v. Overton Square, LLC and Loeb Properties, Inc.*, CH-15-0001-1, Shelby County, TN Chancery Court, 2018
- Won a complete dismissal of all claims against client in a tortious interference case concerning termination of a dealership. *ICM of America, Inc. v. Leica Geosystems, Inc. et al.*, 4:16-cv- 00160 (E.D. Ark. 2017).
- Successfully resolved a dispute concerning ownership of a closely held business. *Jones v. Murphy*, CH-13- 1542 (Shelby County, TN Chancery Court, 2016).
- Won defense verdict in a trade secrets/breach of confidentiality agreement case in federal court in Houston, TX. *Tendeka, Inc. v. Elite Elastomers, Inc.*, Civil Action No. 4:13-cv-01764 (S.D. TX, 2016).
- Won commercial arbitration related to breach of commission agreement for sale of apartment complex. *Marcus & Millichap Real Estate Investment Services, Inc. v. Burkhalter-Vestal, LLC*, AAA Arbitration, Little Rock, AR, June 2015.
- Tried bad faith insurance coverage claim to verdict. *Lindenberg v. Jackson National Life Insurance Co.*, Civil Action No. 2:13-cv-02657 JPM (W.D. Tenn., December, 2014).
- Obtained an arbitration award in favor of our client on alleged breach of warranty claim related to an IPTV system worth hundreds of thousands of dollars including significant claimed consequential damages. *Power & Telephone Supply Company v. Dumont Telephone Company*, AAA Arbitration, April 2014.
- Won defense verdict in Chattanooga, TN construction arbitration. *Nixon v. B & W and Rogers Manufacturing Corp.*, AAA Arbitration.
- Won commercial plaintiff's jury verdict in unfair business practices case in Arkansas. *Curtis Lumber Company, Inc. v. Louisiana Pacific Corporation*, Civil Action No. 2:08-cv-1007 (E.D. Ark.).
- Won favorable award in a breach of contract arbitration in San Antonio, TX concerning a hospital lease. *HR Acquisition of San Antonio v. Behavioral Health Systems*, in private arbitration.
- Won defense verdict in a supplier breach of contract case in Memphis, TN. *Mechanics Laundry v. McKesson*, Civil Action No. 08-2256.
- Won summary judgment for a lessee in a commercial finance lease case concerning energy monitoring equipment. *Gaia Leasing v. Wendelta*, Civil Action No. 09-1067 (D. Minn.).

- Experienced in commercial disputes including those involving breach of contract and usurpation of corporate opportunities including representation of a national professional management company with arbitration disputes in Ohio, Washington, D.C., Georgia, Florida and Puerto Rico.
- Experienced litigating franchise and distribution disputes including representation of a distributor of cottonseed in an international arbitration concerning distribution of cottonseed in Greece, Bulgaria, Turkey and Spain.
- Experienced with insurance coverage disputes including representation of insurance companies in officers and directors liability disputes.
- Experienced in disputes concerning ownership or control of closely held businesses.
- Experienced in cases involving unfair competition including trade secrets, trademarks, breaches of the duty of loyalty, tortuous interference and unfair or deceptive acts or practices.

DISTINCTIONS

- *BL Rankings, The Best Lawyers in America®*
 - Commercial Litigation, 2011-2025
 - Banking and Finance Litigation, 2011-2025
- *Martindale-Hubbell®*
 - AV® – Preeminent™ Peer Review Rated, 2009-2023
- *Thomson Reuters Super Lawyers®*
 - Mid-South Super Lawyers, Business Litigation, 2007-2008, 2011-2024
 - Top 50 – Memphis Super Lawyers, 2013-2014
 - Top 100 – Tennessee Super Lawyers, 2013-2014
- Best of the Bar, *Memphis Business Journal*, 2020
- Pro Bono Service Award, Memphis Area Legal Services, 2006
- Star of the Year Award, American Bar Association, Young Lawyers Division, 2005, 2007
- Top 40 Under 40, *Memphis Business Journal*, 2003
- President's Award, Tennessee Bar Association, Young Lawyers Division, 2002
- Board of Advisors, Memphis Regional Chamber of Commerce
- Fellow, Memphis Bar Foundation
- Fellow, Tennessee Bar Foundation
- Fellow, Tennessee State Chair, American Bar Foundation
- Eagle Scout, 1987

BAR ADMISSIONS

- Arkansas, 2007
- Mississippi, 2006
- Tennessee, 1997
- U.S. District Courts
 - Tennessee: Eastern, Middle, Western
 - Mississippi: Northern, Southern
 - Arkansas: Eastern, Western
 - Colorado: District of Colorado
- U.S. Court of Appeals
 - 5th Circuit
 - 6th Circuit
 - 8th Circuit

EDUCATION

- Vanderbilt University Law School, J.D., 1997
 - Moot Court Board
- University of Tennessee, B.S., Business Administration, *summa cum laude*, 1994

ASSOCIATIONS

- American Law Institute
 - Member, 2023-Present
- American Bar Association
 - Fellow
 - Litigation Section
 - Chair, 2022-2023
 - Revenue Officer, 2016-2018
 - Co-Chair Diversity and Inclusion, 2014-2016
 - Managing Director, 2013-2014
 - Commission on Racial and Ethnic Diversity in the Profession, 2019-2021
 - Standing Committee on Membership
 - Chair, 2013-2016
 - House of Delegates
 - Young Lawyers Division
 - Assembly Speaker, 2005-2007
- Tennessee Bar Association
 - Fellow
 - President, 2011-2012
 - Board of Governors, 2004
 - CLE and Membership Committees
 - Young Lawyers Division
 - President, 2005-2006
- Mississippi Bar Association
- Memphis Bar Association
 - Access to Justice Committee
- Arkansas Bar Association
- Boy Scouts of America
 - National Executive Board, 2023-2026
 - Chickasaw Council, President, 2017-2019

PAPERS, PRESENTATIONS & PUBLICATIONS

- Author, "[Tenn. Ruling Has Broad Relevance To Damages Caps In State](#)," *Law360*, March 9, 2020.
- Presenter, "Ethical Issues for In House Counsel," seminar, November 2016.
- Presenter, "Ethical Issues for In House Counsel," seminar, November 2015.
- Presenter, "Corporate Divorce, Disputes Between Business Owners," seminar, March 2015.
- Presenter, "Covenants Not to Compete," seminar, December 2014.
- Presenter, "Lessons From Watergate: Ethical Obligations for Lawyers," presentation, September 2014.
- Co-Presenter, "Covenants Not to Compete: Overview and Drafting Tips for Tennessee Attorneys," webinar, August 2013.
- Author, "[Picking Judges: Existing System Has Served Tennesseans Well](#)," *Chattanooga*, Sunday, February 19, 2012.
- Author, "Business Gets a Big Boost in the 2011 Legislative Session," *Memphis Business Journal*, 2011.
- Co-Author, "[Recession Triggers Increased Risk of Employee Trade Secret Theft](#)," *Pointe Innovation*, 2011.
- Author, "It Adds Up: Class Action Residual Funds Support Pro Bono Efforts," *Tennessee Bar Journal*, March 2009.
- Co-Author, "Tennessee Law Protects both Consumers, Businesses from Unfair Practices," *Memphis Business Journal*, June 13, 2008.
- Author, "Theoretical Reverse Engineering," ABA Section of *Litigation Business Torts Journal*, Spring 2008.
- Author, "Preserving Electronic Evidence: How Closely Should a Tennessee Court Follow Zubulake?" *Tennessee Bar Journal*, April 2005.
- Author, "The Constitutional Limits of Punitive Damages: The U.S. Supreme Court's Punitive Damages Jurisprudence and its Impact on *Hodges v S.C. Toof & Company*," *Tennessee Bar Journal*, December 2003.
- Author, "The E-Sign Act: A Move in the Right Direction and a Boost for E-Commerce," *Tennessee Bar Journal*, February 2001.
- Presenter, "Effective Writing for Attorneys," Tennessee Bar Association, 2009-2010.
- Presenter, "Business Torts 101: Tortious Interference," Tennessee Bar Association, 2008-2010.
- Presenter, "Business Torts 101: Trade Secrets," Tennessee Bar Association, 2008-2009.
- Presenter, "Business Torts 101: Covenants Not-to-Compete," Tennessee Bar Association, 2007-2009.
- Presenter, "Business Torts 101: The Duty of Loyalty," Tennessee Bar Association, 2008.



JIM LETTEN

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OVERVIEW

Prior to joining the firm, Jim served continuously as the longest serving United States Attorney in the nation at the time of his retirement, with almost 12 years of continuous service – and 30 years with the Department of Justice. Jim focuses his practice on Corporate Compliance and Defense; Foreign Corrupt Practices Act and Anti-Money Laundering/Bank Secrecy Act, Internal Investigations, Corporate Immigration and Trial Advocacy, Government Regulatory Liaison and Anti-Corruption Warranties in Mergers and Acquisitions.

PRACTICE AREAS

- [White Collar, Compliance & Government Investigations](#)
- [Immigration](#)
- [Catastrophic Events & Major Claims](#)
- [Military & National Security Law](#)
- [Government Contracts & Global Trade](#)
- [Professional Liability](#)

INDUSTRY

[Energy](#)

ABOUT

A member of the Commercial Litigation Group, Jim Letten—a 1979 Tulane University law graduate and member of the Louisiana Bar—consults and provides representation on criminal and regulatory investigations by government agencies, as well as civil fraud cases and international trade and regulatory issues, including the establishment of corporate compliance and integrity programs. He previously served 36 years as a prosecutor (31 years with the United States Department of Justice). Before his retirement at the end of 2012, Jim was the longest-serving United States Attorney in the nation and one of only three U.S. Attorneys appointed to the position by successive presidents from different parties. In all, he spent nearly 12 continuous years as the United States Attorney in New Orleans/Southeast Louisiana. Prior to serving as the ranking federal law enforcement official in the District, Jim had distinguished himself as Organized Crime Strike Force Chief and later First Assistant U.S. Attorney.

Jim spent over 30 years prosecuting virtually every type of complex state and federal White Collar, Narcotics and Corruption offense (including extensive experience with RICO prosecutions). He investigated, charged, and tried a broad spectrum of money laundering offenses, including violations of Title 18 US Code Sections 1956 (Laundering) and 1957 (Investment of Illegal Proceeds), as well as Title 31 US Code Section 5324 (Structuring to Evade CTR Reporting Requirements)—all of which contribute to his Anti-Money-Laundering and Bank Secrecy Act compliance skills. Additionally, he was lead prosecutor in a case in which before Congressional enactment of the sting provision of 31 USC 5324 prohibiting structuring, in order to bring federal charges against launderers in an undercover operation, he successfully charged individual violators as “financial institutions” under Title 31.

Over the years Jim has also taught and lectured extensively on the investigation and prosecution of a broad range of Public Corruption offenses, including the RICO, Extortion, Laundering and other federal violations on which former Louisiana Governor Edwin Edwards and co-defendants were convicted in 2000 when Jim led the lengthy and complex investigation and four-month trial. As United States Attorney, Jim served on the Attorney General’s Advisory Committee (AGAC) and co-chaired the AG’s Special Policy Review Working Group on Capital Punishment. He also served on the AGAC Subcommittees on Terrorism and National Security, as well as Environmental Issues.

A military veteran of 20 years in the U.S. Naval Reserve, Jim is a retired Navy Commander, having focused much of his career on foreign counterintelligence (having been variously tasked to Defense Intelligence Agency and Office of Naval Intelligence); and some 13 years as a fully-credentialed NCIS Agent.

Following the devastation of Hurricane Katrina, Jim helped to establish and eventually served as the Director of the National Center for Disaster Fraud. He also received recognition for his leadership from the Attorney General of the United States and due to his anti-corruption expertise, has lectured and has been published in China on the U.S. FCPA and global anti-corruption trends and legislation, on behalf of Tulane, Yale and Zhejiang Province Law Schools. Jim has also provided representation to major American Universities on sensitive issues involving grant compliance and protection of sensitive personal privacy data involving the EU.

EXPERIENCE

- Jim consults and provides representation on criminal and regulatory investigations by government agencies, as well as government audits, civil fraud cases and international trade and regulatory issues, including establishment of FCPA/UK Bribery Act corporate compliance and integrity programs; Anti-Money Laundering/Bank Secrecy Act/Counter-Terrorist Financing (AML/BSA/CTF) compliance programs; building and reviewing Anti-Corruption warranties in corporate mergers and acquisitions; and training and monitoring state and local police departments on constitutional policing, as well as complex litigation.
- Deputy Monitor, Court-Appointed: City of Memphis/Memphis Police Department Federal Consent Decree (with Monitor and Special Master, Ed Stanton – Butler Snow) (2018-Present)
- Assistant Dean, Experiential Learning, Tulane University School of Law (2013-2016): Responsible for oversight, development and expansion of all skills-based educational components of the law school, including moot court, law clinics, student externships, Intersession intensive training “boot camp”, trial advocacy program, capstone and skills-based legal courses and other related programs.
- United States Attorney for the Eastern District of Louisiana (2001-2012): Served continuously as the longest serving United States Attorney in the nation with almost 12 years of continuous service.
- First Assistant United States Attorney for the Eastern District of Louisiana (1994-2001): Supervised the daily operations of the United States Attorney's office. Additionally, served as the lead prosecutor in the investigation and four-month jury trial resulting in the conviction of former Louisiana Governor Edwin Edwards.
- Trial Attorney and Chief, US Department of Justice Organized Crime and Racketeering Strike Force, New Orleans, Louisiana (1982-1989): Strike Force cases involved complex criminal (RICO) offenses and investigations over 5 states, principally traditional organized crime (La Cosa Nostra/ Mafia), as well as labor racketeering, drug cartels, violent interstate/international gangs, and emerging/non-traditional/international organized crime.
- Assistant District Attorney, New Orleans District Attorney's Office (1980-1982, 1985-1986): Senior Assistant DA in 1981; Special Prosecutions (primarily corruption) in 1985 – 1986; Prosecuted all types of criminal cases, from misdemeanors to capital and complex white-collar and corruption offenses, including both political and law enforcement corruption.

- Military Experience

- Retired Commander, U.S. Naval Reserve, 1984-2004
- Served as a fully-credentialed NCIS Agent and Foreign Counter-Intelligence Officer (both Cold War and post-Cold War)
- Assignments over 20 years included:
 - Squadron Intelligence Officer
 - Foreign Counter-Intelligence Officer assigned to both the Defense Intelligence Agency and the Office of Naval Intelligence
 - Fully-Credentialed NCIS Agent, with street counter-drug operations, numerous Presidential and Vice-Presidential Protective Service Details, and Counter neo-Nazi force protection in Europe
 - At U.S. European Command in Germany, drafted initial framework for permanent International War Crimes Tribunal

DISTINCTIONS

- *Chambers USA, America's Leading Lawyers for Business*
 - Litigation: White-Collar Crime & Government Investigations – Louisiana, 2024-2025
- *Martindale-Hubbell®*
 - AV® – Preeminent™ Peer Review Rated, Current
 - AV® – Preeminent™ Attorney – Judicial, Current
 - AV® – Preeminent™ Attorney – Top 1%, Current
- Commander (O-5), U.S. Navy Reserve, 1985-2005 (NCIS Officer-Agent)
- Boy Scouts of America, Annual 2020 Pillars of Scouting Award
- Torch of Liberty Award, Anti-Defamation League, 2010
- Superintendent's Special Achievement Award, New Orleans Police Department, 2012, 2015
- Special Appreciation Award, Sheriff Newell Normand, 2015
- Champion Award, New Orleans Family Justice Center, 2013
- Criminal Justice Lifetime Achievement Award, Crimestoppers 2013
- Outstanding Lifetime Achievement Award, Victims and Citizens Against Crime, 2013
- Commandant's Meritorious Public Service Award/Medal, United States Coast Guard, 2013
- Dr. Martin Luther King Junior Special Award, Louisiana Rescue Mission Fellowship, 2012
- Annual Citizen of the Year Honoree, American Heart Association, 2012
- CityBusiness Leader in Law, 2010, 2016
- Distinguished Citizen of the Year, Southeast Louisiana Boy Scouts of America, 2010
- Distinguished Alumnus of the Year, University of New Orleans, 2008
- Medallion for Distinguished Service, United States Attorney General, 2006
- Distinguished Alumnus of the Year, University of New Orleans College of Liberal Arts, 2006
- Law Enforcement Professional of the Year Award, Federal Law Enforcement Officers Association (FLEOA), 2005
- Top Attorney in New Orleans, *New Orleans Magazine*, 2007
- Most Admired New Orleanian, *New Orleans Magazine*, 2008, 2009
- New Orleanian of the Year, *Gambit Magazine*, 2009
- Distinguished Service Award for Trial of Litigation, United States Attorney General, 2001
- Director's Award, United States Department of Justice Executive Office for United States Attorneys, 1996
- Task Force Award for "Crushing Defeat of the Mafia in Louisiana," FBI Organized Crime/State Police, 1995
- Special Commendation for Outstanding Service to the Criminal Division of the United States Department of Justice, from the Deputy Attorney General for the Criminal Division, March 1989

BAR ADMISSIONS

- Louisiana, 1979

EDUCATION

- Tulane University, J.D., 1979
- University of New Orleans, B.A., Communications, 1976

ASSOCIATIONS

- American Bar Association
 - Co-Chair, Criminal Justice Section
 - Computer Crime, Intellectual Property and Trade Secrets Subcommittee
- Louisiana State Bar Association
 - Louisiana Attorney Disciplinary Board (Appointed by Louisiana Supreme Court, December 2022)
 - Board Member
 - Louisiana State Bar Association Disciplinary Section
 - Committee Chair, 2017-2022
 - Center for Law and Civic Education
 - Board Member, 2002-2005
- Federal Bar Association
- National Association of Former United States Attorneys (NAFUSA)
 - Board of Directors (2023-Present)
- Military Order of Foreign Wars (Navy Veteran)
- Navy League
 - Executive Vice President/President-Elect - Greater New Orleans Chapter
- New Orleans Metropolitan Crime Commission
 - Executive Board Vice Chair
- New Orleans Police and Justice Foundation
 - Executive Board Member/Secretary-Treasurer
- New Orleans Citizens' Diplomacy Council
 - Advisory Board Member
- New Orleans Crimestoppers
 - Executive Board Co-Chairman (2019-2022)
- Naval Reserve Association
- Old Salts and Assorted Spies - Retired Naval Intelligence Association
- World Trade Center - New Orleans
- GNO Inc. - Regional Economic Development Corporation

PAPERS, PRESENTATIONS & PUBLICATIONS

- Moderator, "A View from the Top: Insights on Law Enforcement in Orleans and Jefferson Parishes," Breakfast Briefing Series, Bureau of Governmental Research, May 12, 2022.
- Author, "**Companies as Victims of Internal Crimes: Internal Investigations Can Make A Critical Difference**," ACC South Carolina, 1st Quarter 2022 Newsletter, April 6, 2022.
- Panelist, 11th Annual Conference of Yale and Law School's New Haven School of Jurisprudence and International Law, Hangzhou, China, October 2021.
- Author, "**DOJ's Yates Memorandum 5 Years Down the Road: Alive but is it Kicking? FCPA Enforcement of Individuals Post-'Yates'**," ACC TN Q2 Newsletter, June 2020.
- Speaker, "Recent Developments and Trends in the U.S. Foreign Corrupt Practices Act (FCPA) and Global Anti-Corruption Efforts," 10th Annual Conference of Yale Law School's New Haven School of Jurisprudence and International Law, Hangzhou, China, June 2019.
- Panelist, "Current Trade Dispute Between the U.S. and China and Its Implications for Other Countries and Global Trade," 10th Annual Conference of Yale Law School's New Haven School of Jurisprudence and International Law, Hangzhou, China, June 2019.
- Speaker, "Crisis Response and Continuity of Operations," Massachusetts Institute of Technology School of Architecture and Planning, November 19, 2018.
- Co-Author, "Customs System and the Law, Foreign Trade System and Law and Foreign Direct Investment System and Law," *Essentials of the Laws of the Belt and Road Countries – Australia, U.K., U.S.*, 2017.
- Author, "The U.S. Foreign Corrupt Practices Act and the Importance of Anti-corruption Efforts in Trade Globalization," *International Law Perspective of the Belt and Road Initiative*, 2015.
- Regular presenter and planner at the University of Texas Law School's Government Enforcement Institute (GEI), speaks and moderates on relevant topics related to issues on corporate compliance and fraud.
- Co-Author, "U.S. Laws Affecting International Trade," for an international publication in Chinese, English and other languages, as part of the "One Belt One Road Initiative," 2016.
- Author, "The Yates Memo: What New Challenges to Expect," *Law 360*, 2016.
- Author, "The U.S. Foreign Corrupt Practices Act and the Importance of International Anti-Corruption Efforts in Trade Globalization," published in Chinese, English, and numerous languages in the publication entitled *International Law Perspective of the One Belt One Road Initiative*, Hong Kong, 2015.
- Keynote speaker, "Combating Corruption," National Conference of the National Association of Inspectors General, Detroit, October 2015.
- Speaker, "Topic," JPSO Graduation, New Orleans, Louisiana, 2015.
- Speaker, "The Foreign Corrupt Practices Act (FCPA)," One Belt, One Road International Trade Conference, Hong Kong City Law School, Hong Kong, July 2015.
- Author, "Crisis Response and Continuity of Operations: A Personal Account of My Experiences During and After Hurricane Katrina," *Tulane Law Review*, Vol. 87, No. 5 & 6, 2013.

- Co-Author, "USAO Crisis Management and Continuity of Operations During and After Disasters: A case study based on the Hurricane Katrina experience in the Eastern and Middle Districts of Louisiana," *Crisis Response and Related Litigation* 119, 143, 2009.
- Commencement Speaker, University of New Orleans, 2009.
- Keynote Speaker and Panel Conductor, "Conference on Transparency and Ethics: Towards an Accountable Society," (First Conference on Corruption in Eastern Europe following the Collapse of the Soviet Union and the Warsaw Pact), Czech Republic, September 19, 2007.
- Commencement Speaker, University of New Orleans, College of Liberal Arts, 2006.

CIVIC INVOLVEMENT

- Jefferson Parish Quality Assurance Review Committee of the Inspector General's Office
 - Committee Member, 2017-Present
- Tulane University's Emergency and Security Studies Industry Advisory Board
- Tulane University Law School Alumni Association
- University of New Orleans Alumni Association, Selection Committee
- Boy Scouts of America Southeast Louisiana Council
 - President, 2016-2020
 - Executive Board Member
- De La Salle High School Alumni Association
- National World War II Museum, PT-305 Advisory Board
- Higgins Boat Society, Volunteer/Member, PT-305 Restoration Team, 2007-Present
- Crescent Leadership Academy Charter School, Board Member, 2013-2018
- Louisiana Employer Support of the Guard and Reserve (ESGR), Board Member, 2002-2012

EXHIBIT C

ATTORNEYS' FEES SINCE ISSUANCE OF SANCTIONS ORDER

Date	TKPR Name	Rate	Base Amt	Narrative	Bs Hrs	Mod Hrs
7/10/2025	John H. Dollarhide	445	\$1,379.50	Work on calculating narrowed attorneys' fees for sanctions fee petition as instructed by the court in sanctions order.	3.1	
7/11/2025	John H. Dollarhide	445	\$845.50	Continue work on sanctions fee petition fees calculation and exhibit preparation.	1.9	
7/14/2025	John H. Dollarhide	445	\$578.50	[REDACTED] work on fee petition (1.3).		1.3
7/14/2025	David L. Johnson	450	\$360.00	Preparation of attorney's fee application as it relates to initial motion for sanctions.	0.8	
7/15/2025	John H. Dollarhide	445	\$623.00	Finalize support for fee petition including collection and review of Repario invoices and attorney invoices; [REDACTED]		1.4
7/15/2025	David L. Johnson	450	\$180.00	Preparation of fee application; [REDACTED]		0.4
7/16/2025	David L. Johnson	450	\$90.00	[REDACTED]; finalize fee application;		0.2
7/28/2025	Daniel W. Van Horn	595	\$297.50	Work on evaluation of the opposition/response to our motion for attorneys' fees.	0.5	
7/31/2025	John H. Dollarhide	445	\$890.00	Review response to motion for attorneys' fees and related work on	2	
7/31/2025	David L. Johnson	450	\$180.00	Review of defendant's response to attorney's fee application and coordination of reply as it relates to same.	0.4	
8/1/2025	John H. Dollarhide	445	\$801.00	Work on reply in support of motion for attorneys' fees.	1.8	
8/1/2025	Daniel W. Van Horn	595	\$178.50	Review of the response to the sanctions motion for ways to improve the same.	0.3	
8/4/2025	John H. Dollarhide	445	\$2,803.50	Continue work on reply in support of motion for attorneys' fees	6.3	
8/4/2025	Jeff Baum	265	\$185.50	Work on analysis of attorney fees	0.7	
8/4/2025	David L. Johnson	450	\$45.00	Phone call with John Dollarhide.	0.1	
8/5/2025	John H. Dollarhide	445	\$445.00	Work on revisions to reply in support of motion for fees; review Repario invoices and make reductions for Lassens and non-defaulted Defendants and include table and explanatory paragraph in reply.	1.9	1
8/5/2025	Jeff Baum	265	\$583.00	Continue analysis of attorney fees	2.2	
8/5/2025	David L. Johnson	450	\$2,025.00	Prepared/edited reply brief supporting application for attorneys' fees.	4.5	
8/6/2025	David L. Johnson	450	\$1,125.00	Finalize reply ISO fee application and supplemental declaration.	2.5	
8/6/2025	John H. Dollarhide	445	\$2,447.50	Work on finalizing fee application reply and related tasks.	5.5	
			\$16,063.00		37.7	